

**Federal Defenders
OF NEW YORK, INC.**

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June 27, 2024

BY ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Michael Edwards
23-Cr-578

Dear Judge Koeltl:

I represent defendant Michael Edwards in the above-captioned case. I write to request that the Court adjourn this matter for a status conference the week of August 12. Neither the government nor co-defendant's counsel object to this request.

This matter is currently scheduled for a suppression hearing on July 26. The parties did not file suppression motions, however. Instead, we have been engaged in good faith plea discussions with the government. The Court scheduled a change of plea hearing for Mr. Edwards to take place on July 3. With regards to Mr. Edwards, however, the government has provided an updated view of Mr. Edwards's sentencing exposure that will necessitate further discussion and investigation by the defense. The defense has requested a new *Pimentel* letter. Although Mr. Edwards is asking the Court to cancel the July 3 change of plea hearing and July 26 suppression hearing at this time, we are hopeful we will reach a resolution given an adjournment to mid-August.

It is therefore requested that the Court adjourn this matter to either August 12, August 13 after 2 p.m., August 14, or August 16. If those dates are unavailable, we are happy to propose other dates. The parties consent to the exclusion of time until the next conference pursuant to 18 U.S.C. § 3161(h)(7)(a).

Sincerely,



Michael Arthus
Assistant Federal Defender
212-417-8760

cc. (by ECF): Matthew Kluger, Esq.; AUSAs Jerry Fang and William Stone

BORN JULY 3, 2024 PLEA AND
JULY 26 SUPPRESSION HEARING
ARE CANCELED. THE PARTIES SHALL
APPEAR FOR A CONFERENCE ON
WEDNESDAY, AUGUST 7, 2024,
AT 11:00AM. SO ORDERED.

J. G. Koeltl
8/27/24 ✓ S O J